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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
ADMINISTRATIVE MOTION TO
SUPPLEMENT THEIR MOTION TO
EXCLUDE THE TESTIMONY OF
MICHAEL WAGNER**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Exhibits to Their Administrative Motion
8 to Supplement Their Motion to Exclude the Testimony of Michael Wagner (the “Administrative
9 Motion”). The Administrative Motion seeks an order sealing the entirety of Exhibits 1-7 to the
10 Declaration of Halley Josepchs.

11 3. The entirety of Exhibits 1-3 and 6 contain or refer to trade secrets and/or confidential
12 business information, which Waymo seeks to seal.

13 4. Exhibits 1-3 and 6 (entire documents) contain, reference, and/or describe Waymo’s
14 asserted trade secrets or information that, from context, tends to disclose Waymo’s asserted trade
15 secrets. The information Waymo seeks to seal includes the confidential design and functionality of
16 Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo
17 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-
18 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of
19 this information would give Waymo’s competitors access to descriptions of the functionality or
20 features of Waymo’s autonomous vehicle system. If such information were made public, I understand
21 that Waymo’s competitive standing would be significantly harmed.

22 5. Exhibits 1-3 (entire documents) additionally contain, reference, and/or describe
23 Waymo’s highly confidential and sensitive business information. The information Waymo seeks to
24 seal regards confidential analysis of Waymo’s business and competition, including financial details. I
25 understand that this confidential business information is maintained by Waymo as secret. The public
26 disclosure of this information would give Waymo’s competitors access to in-depth insight into—and
27 analysis of—Waymo’s business strategy for its autonomous vehicle system. If such information were
28 made public, I understand that Waymo’s competitive standing would be significantly harmed.

6. Waymo's request to seal is narrowly tailored to those portions of Exhibits 1-3 and 6 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 29, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor
Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven